

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

COMPASS MARKETING, INC.

Plaintiff

v.

FLYWHEEL DIGITAL, LLC, *et al.*

Defendants

:  
:  
:  
:  
:  
:  
:  
:  
:  
:

Civil Action No. 1:22-CV-00379  
Judge George Levi Russell, III

**LINE**

Defendants Michael White and George White (“Michael and George White”), by and through counsel, Jeffrey M. Schwaber, Judith G. Cornwell, and Stein Sperling Bennett De Jong Driscoll PC, hereby submit this line to adopt and incorporate by reference into the Reply in Support of Defendants Michael White and George White’s Motion to Dismiss (ECF 49), the arguments set forth in Daniel White’s Reply (ECF 50), given Compass’s single consolidated response in opposition to the motions to dismiss filed separately by Michael and George White, on the one hand, and Defendant Daniel White, on the other hand.

Respectfully submitted,

STEIN SPERLING BENNETT  
DE JONG DRISCOLL PC

/s/ Jeffrey M. Schwaber  
Jeffrey M. Schwaber (Bar ID 06095)  
jschwaber@steinsperling.com  
Judith G. Cornwell (Bar ID 20777)  
[jcornwell@steinsperling.com](mailto:jcornwell@steinsperling.com)  
(301) 354-8131 (facsimile)  
1101 Wootton Parkway, Suite 700  
(301) 340-2020

*Attorneys for Michael White and George White*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, that on this 1<sup>st</sup> day of June, 2022, a copy of the foregoing was electronically filed and served on all counsel of record via CM/ECF.

/s/ Jeffrey M. Schwaber  
Jeffrey M. Schwaber